

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**WOLVERINE BARCODE IP, LLC,
Plaintiff,**

v.

**ALBERTSONS COMPANIES, INC.,
Defendant**

Civil Action No. 3:25-cv-01448

JURY TRIAL DEMANDED

**PLAINTIFF’S MOTION FOR WAIVER OF
LOCAL COUNSEL REQUIREMENT**

Plaintiff, Wolverine Barcode IP, LLC is represented by the undersigned counsel in this Court for the Northern District of Texas and respectfully request that it be allowed to proceed without the necessity of associating additional local counsel in accordance with Local Rule 83.10 and would show the Court the following.

Plaintiff’s counsel, William P. Ramey, III, (“Ramey”) has been admitted to practice before this Court for the Northern District of Texas since February 21, 2001. Ramey is able and willing to appear at any hearing called by the presiding judge, or to perform on behalf of any other duty required by the presiding judge or the local rules of this Court, in accordance with Local Rule 83.10. Ramey maintains a fully staffed principal law office in Houston, Texas and has appeared before fellow Judges in this district in the following matters:

Cloud Systems HoldCo IP, LLC v. Climatex, LLC, 3:25-cv-01065
WirelessWerx IP, LLC v. Tail Light, LLC d/b/a Bouncie, 3:25-cv-01026
WirelessWerx IP, LLC, Nissan North America Inc., 3:25-cv-000382
WirelessWerx IP, LLC v. Hyundai Motor America, Inc., 3:25-cv-00341
Cloud Systems HoldCo IP. LLC v. RGB Systems, Inc., 3:25-cv-00712
Linfo IP, LLC v. Air Oasis, LLC, 3:25-cv-00129
Mesa Digital, LLC v. Nuu, Inc., 3:24-cv-02408
Verna IP Holdings, LLC v. PocketStop, LLC 3:24-cv-02408

VDPP, LLC v. CostarHD, LLC 3:24-cv-01666
Err Content IP LLC v. LG Electronics Inc et al, 3:24-cv-02191
VDPP, LLC v. Amazon.com, Inc., 3:24-cv-02118
VDPP LLC v. CostarHD LLC, 3:24-cv-01666
VDPP LLC v. Advanced Technology Video Inc., 3:24-cv-01523
VDPP, LLC v. Mercedes-Benz USA, LLC, 3:24-cv-00664
VDPP LLC v. Canon USA Inc., 3:24-cv-00570
VDPP LLC v. NEC Corporation of America Texas 3:24-cv-00566
VDPP LLC v. ZTE USA Inc., 3:24-cv-00082
VDPP LLC v. Carparts.com Inc., 3:24-cv-00199
VDPP LLC v. ZTE USA Inc., 3:24-cv-00082
Cloud Systems HoldCo IP LLC v. Monitronics International Inc., 3:24-cv-00515
Front Row Technologies, LLC v. Dallas Cowboys Football Club, Ltd., 4:23-cv-00943
VDPP, LLC v. American Honda Motor Co., Inc., 4:23-cv-00929
VDPP, LLC v. American Honda Motor Co., Inc., 4:23-cv-00843
PacSec3 LLC v. One Plus USA Corp., 3:23-cv-02830
Verna IP Holdings LLC v. Dais Inc., 3:23-cv-02594
Galicia IP LLC v. American Honda Motor Co Inc., 3:23-cv-02370
VDPP LLC v. One Plus Corp., 3:23-cv-01864
Street Spirit IP LLC v. Match Group Inc., 3:23-cv-01304
Ortiz & Associates Consulting LLC v. Vizio Inc., 3:23-cv-00791
Arena IP LLC v. Minnesota Vikings Football LLC, 3:23-cv-00260
Arena IP LLC v. Extreme Networks Inc., 3:23-cv-00238
Haley IP LLC v. GPS Insight LLC, 3:23-cv-00210
Contiguity, LLC v. Traffic Logix Corporation, 3:23-cv-00187
Contiguity LLC v. Hikvision USA Inc., 3:23-cv-00160
Front Row Technologies LLC v. U-Blox America Inc., 3:23-cv-00157
AML IP LLC v. Bloomingdales.com LLC, 3:23-cv-00102
VDPP LLC v. Panasonic Corporation of North America, 3:22-cv-02831
MCom IP LLC v. Citizens Financial Group Inc. et al, 3:22-cv-02447
MCOM IP LLC v. Citibank NA et al, 3:22-cv-02398
AuthWallet LLC v. HOTELS.COM LP, 3:22-cv-01778
AuthWallet LLC v. Omni Hotels Management Corporation, 3:22-cv-01776
SAP America Inc. v. Pedersen, 3:22-cv-01534
WFR IP LLC v. Motorola Mobility LLC, 3:22-cv-01434
Missed Call LLC v. NEC Corporation of America, 3:22-cv-01079
InnoMemory LLC v. Kyocera Document Solutions America Inc., 3:22-cv-01061
ZT IP LLC v. VMware Inc., 3:22-cv-00970
Escapex IP LLC v. Spotify USA Inc., 3:22-cv-00963
mCom IP LLC v. CIBC Bank USA, 3:22-cv-00574

AK Meeting IP LLC v. Atos IT Solutions and Services Inc., 3:22-cv-00550
VDPP LLC v. Bloomingdale's Inc., 3:22-cv-00448
PacSec3 LLC v. Mimecast North America Inc., 3:22-cv-00396
GEOTAG IP, LLC. v. IDENTIV INC., 3:22-cv-00340
Wikeshire IP LLC v. Kapsch TrafficCom Services, USA, Inc., 3:22-cv-00240
Savannah Licensing LLC v. Nuu Mobile Corporation, 3:22-cv-00226
Pixeltide Pathway LLC v. Lojack Corporation, 3:22-cv-00225
Gold IP LLC v Shockwatch Inc., 3:21-cv-02544
MCOM IP LLC v. UNISYS Corporation, 3:21-cv-02288
mCom IP LLC v. Corp.orate America Family Credit Union Texas, 3:21-cv-02285
MCOM IP LLC v. Nautilus Hyosung Americas, 3:21-cv-02215
mCom IP LLC v. Avaya Holdings Corp., 3:21-cv-01550
DatRec LLC v. Infor Inc., 3:21-cv-01281
Riggs Technology Holdings LLC v. Salesforce.com LLC, 3:21-cv-00733
Cybersoft IP LLC v. Fireeye Inc., 3:21-cv-00365
DatRec LLC v. Allscripts Inc., 3:21-cv-00110
DatRec LLC v. McKesson Corporation, 3:21-cv-00106
Richter v. Carnival Corporation et al, 3:18-cv-02172
NetSoc LLC v. Match Group LLC, 3:18-cv-01809

Plaintiff, therefore, requests that the Court grant leave to proceed with the undersigned counsel without the appearance of additional local counsel.

DATED: June 6, 2025

Respectfully submitted,

Ramey LLP

By: /s/ William P. Ramey, III
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CERTIFICATE OF CONFERENCE

Pursuant to Local Rules, William Ramey, counsel for Plaintiff, certifies that complaint has not yet been served.

/s/ William P. Ramey, III
William P. Ramey, III

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and LR5, I hereby certify that all counsel of record who have appeared in this case are being served on this day of June 6, 2025, with a copy of the foregoing via email and ECF filing.

/s/ William P. Ramey, III
William P. Ramey, III